

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

E.5  
07/26/91

In the matter of:

Albion-Sheridan Township Landfill,  
13355 29-Mile Road  
Albion, Michigan

The deposition of LLOYD MOSHER was taken before Lynne Haf, CSR-4545, a Notary Public in and for the County of Ingham, acting in the County of Jackson, on Friday, July 26, 1991, at Jackson County Courthouse, 312 South Jackson, Jackson, Michigan, commencing at or about 9:00 a.m.

APPEARANCES:

U. S. Environmental Protection  
Agency, Region V  
BY: BETH A. HENNING, J.D.  
Assistant Regional Counsel  
230 South Dearborn Street  
Chicago, Illinois 60604

and

U.S. Environmental Protection  
Agency, Region V  
BY: PAUL J. ROGERS  
Investigator  
230 Dearborn, 5HSM-TUB7  
Chicago, Illinois 60604

ALSO PRESENT:

MARY BETH NOVY

US EPA RECORDS CENTER REGION 5



468930

---

INDEX OF WITNESSES

---

IDENTIFICATION	PAGE
LLOYD MOSHER	
Examination by Ms. Henning	5
Break taken	26
Break taken	46

---

INDEX OF EXHIBITS

---

IDENTIFICATION	MARKED
Mosher Deposition Exhibit Number 1	55

1 Jackson, Michigan  
2 Friday, July 26, 1991  
3 9:00 a.m.

4 L L O Y D M O S H E R

5 having been first duly sworn by the Court Reporter, was  
6 examined and testified on his oath as follows:

7 MS. HENNING: Mr. Mosher, my name is  
8 Beth Henning, and I'm from the United States  
9 Environmental Protection Agency.

10 THE WITNESS: You're going to have  
11 to talk up.

12 MS. HENNING: Okay. And I'm from  
13 the United States Environmental -- is that good?

14 THE WITNESS: That's better.

15 MS. HENNING: Okay.

16 -- Protection Agency from Chicago;  
17 and I just want to ask you a few questions about the  
18 Albion-Sheridan Township Landfill.

19 And I have with me today Paul  
20 Rogers, who is seated to my right, and Mary Beth Novy,  
21 who is seated to your left.

22 Just a couple of general questions.

23 THE WITNESS: Okay.

24 MS. HENNING: All right. Since  
25 you've already expressed a concern that you can't

1 hear --

2 THE WITNESS: Now, you people are  
3 asking something that happened twenty years ago.

4 MS. HENNING: Right.

5 THE WITNESS: Okay.

6 MS. HENNING: Okay. If you don't  
7 hear a question that I ask --

8 THE WITNESS: I'll ask.

9 MS. HENNING: -- ask me to repeat  
10 the question, okay?

11 If you don't understand what I'm  
12 saying, you can ask me to rephrase the question for you;  
13 and if you realize later on that you've answered a  
14 question, but you think that you'd like to change your  
15 answer, let us know that and we'll make sure that the  
16 record reflects that.

17 If you want to take a break to use  
18 the rest room or to get a drink of water or coffee, let  
19 us know that. That's fine.

20 And if you don't know or don't  
21 remember, since it is twenty years ago, just say so.  
22 You don't have to speculate; just say "I don't know."

23 If you answer a question, I'm going  
24 to assume that you've understood and that you've heard  
25 the question that I've asked you. Okay?

1 THE WITNESS: Okay.

2 MS. HENNING: Do you understand all  
3 these instructions?

4 THE WITNESS: So far.

5 MS. HENNING: Okay.

6 EXAMINATION

7 BY MS. HENNING:

8 Q We're just going to go for a few general questions to  
9 start off with.

10 If you could spell your name for the  
11 record, state your name and spell it.

12 A My name is Lloyd Mosher.

13 Q Uh-huh.

14 A L-l-o-y-d, Mosher, M-o-s-h-e-r.

15 Q And you live at --

16 A 2701 Calhoun Road, Lot 26.

17 Q Okay. And your phone number?

18 A My phone number is 629-6837.

19 Q And are you married?

20 A Yes.

21 Q To whom?

22 A Mary Lynn Mosher.

23 Q And how long have you been married?

24 A Forty years.

25 Q Forty years. Do you have any children?

1 A No.

2 Q No. Have you attended any school, high school?

3 A Seventh grade.

4 Q Seventh grade, okay.

5 And where did you attend school?

6 A Albion High School, Albion.

7 Q Okay. Do you know what the case is about today --

8 A Yep.

9 Q -- that we're asking questions?

10 Did you discuss the case with  
11 anyone?

12 A Nope.

13 Q Nope. And you didn't discuss it with any attorneys,  
14 have any -- aside from myself.

15 A My boss is the only one I talked to on it.

16 Q And your boss is --

17 A Whitey Hall -- Don Hall. I call him Whitey.

18 Q Whitey Hall. When did you speak to Mr. Hall?

19 A After Paul Rogers talked to me; called me and told me -  
20 - I asked him what it was all about.

21 Q And that would have been in --

22 MR. ROGERS: March 6, 1991.

23 Q (BY MS. HENNING, CONTINUING) Before you came here to -  
24 -

25 MR. ROGERS: Or do you mean just

1 recently, when I called you to set this up?

2 THE WITNESS: You called me twice?

3 MR. ROGERS: I called you once on

4 March 6th and --

5 THE WITNESS: Who called me the next

6 time? Some man.

7 MR. ROGERS: That would have been

8 me. Just recently, to see if you would be willing to

9 come in and do this deposition?

10 THE WITNESS: Yes.

11 MR. ROGERS: Yes, that was me; and

12 that would have been a couple of weeks ago.

13 Q (BY MS. HENNING, CONTINUING) Did you review any  
14 documents before you came here today, any pictures or  
15 articles from the newspaper?

16 A Nope.

17 Q Now, I believe that you worked for Whitey Hall; is that  
18 correct?

19 A Yes.

20 Q And you worked for him at Blyveis -- is that how you say  
21 it, Blyveis?

22 A I don't know.

23 Q And that's spelled B-l-y-v-e-i-s?

24 A I don't know now. It's been a long time.

25 Q What position did you hold at Blyveis?

- 1 A Truck driver, crane operator, mechanic.
- 2 Q Jack of all trades?
- 3 A That's right.
- 4 Q So your responsibilities included just about everything
- 5 that --
- 6 A Everything he told me to do.
- 7 Q Okay. Did you hold any other positions at Blyveis?
- 8 A No.
- 9 Q What type of truck driving experiences did you have at
- 10 Blyveis? What did you do there?
- 11 A Drove dump truck, semi.
- 12 Q And what did you haul for Blyveis?
- 13 A Cardboard.
- 14 Q Cardboard.
- 15 A Scrap iron.
- 16 Q Where did you get the cardboard?
- 17 A McGraw Edison.
- 18 Q McGraw Edison. And how about the iron?
- 19 A Come from McGraw Edison, some of it.
- 20 Q Did you haul for any other companies?
- 21 A If I did, I didn't know it.
- 22 Q Yes.
- 23 A It was through him.
- 24 Q So at Blyveis your responsibilities were all for hauling
- 25 for McGraw Edison?



- 1 A Hauled from three shops around there.
- 2 Q From three shops of McGraw Edison?
- 3 A Yes.
- 4 Q Do you know where all those shops were located?
- 5 A Albion Industry, Corning, McGraw; Albion Industry and
- 6 Corning.
- 7 Q What type of work did Albion Industry do?
- 8 A They made castings.
- 9 Q Castings. Were they always known as Albion Industry?
- 10 A Yeah.
- 11 Q Do you know when they closed business?
- 12 A They haven't closed it.
- 13 Q They're still working?
- 14 A Yes, they're working.
- 15 Q What type of materials did you haul for them?
- 16 A Shavings, steel shavings.
- 17 Q And where did you take these shavings?
- 18 A Jackson.
- 19 Q Do you recall where in Jackson?
- 20 A Jackson Iron on Page Avenue.
- 21 Q What avenue?
- 22 A On Page Avenue.
- 23 Q And then you hauled for McGraw Edison?
- 24 A Yeah, hauled for McGraw Edison.
- 25 Q And you picked up cardboard?

- 1 A Cardboard, paint barrels.
- 2 Q Now was this for Blyveis, or was this for Whitey Hall?
- 3 A It was for McGraw Edison. It was contracted through
- 4 McGraw Edison.
- 5 Q Okay. And who was your supervisor when you were hauling
- 6 these materials?
- 7 A Whitey Hall.
- 8 Q And the business was known as --
- 9 A Blyveis Iron.
- 10 Q Blyveis Iron. Now, was Whitey your supervisor
- 11 throughout all of your employment?
- 12 A Yes.
- 13 Q How long were you employed with --
- 14 A Fifteen years.
- 15 Q Fifteen years. When did you begin?
- 16 A I don't know.
- 17 Q When did you retire from Blyveis?
- 18 A I quit there in '72.
- 19 Q You retired then?
- 20 A No, I just quit. I had back trouble.
- 21 Q Did you take another position then?
- 22 A Five years later, I did; not there, at a gas station.
- 23 Q At a gas station. Are you currently employed?
- 24 A No, I'm retired.
- 25 Q Whitey was your supervisor for all fifteen years?

- 1 A Right.
- 2 Q And you never had any other supervisors?
- 3 A Not there.
- 4 Q Did you ever supervise anyone?
- 5 A He'd tell me and I'd tell the rest of them what to do.
- 6 Q And who were the rest of them? Do you recall any names?
- 7 A Guy Gibson, some guy from Battle Creek named Bob; that
- 8 was about it.
- 9 Q What kind of supervisory responsibilities? What did you
- 10 do as their supervisor?
- 11 A Just tell them where to go; what truck to take and where
- 12 to go.
- 13 Q Did you ever write these orders down?
- 14 A No.
- 15 Q So it was all verbal orders?
- 16 A Yep.
- 17 Q And from Whitey, were those verbal orders?
- 18 A When he wasn't there, I told them where to go.
- 19 Q So you were second in command?
- 20 A Yes, I guess you'd call it that.
- 21 Q And as a truck driver, you drove from Corning, McGraw,
- 22 and Albion Industry?
- 23 A Right.
- 24 Q What kind of materials did you haul from Corning?
- 25 A Corning was cardboard.

1 Q Cardboard? No other materials?

2 A No.

3 Q Where did you take --

4 A Iron.

5 Q Iron? What type of iron, shavings?

6 A No, no. Stuff they tore out or repair the --

7 Q Scrap?

8 A Scrap, yes.

9 Q And where did you take the iron?

10 A Back to the yard.

11 Q "The yard," your yard?

12 A Yep.

13 Q And what did you do with the iron then?

14 A Cut it up smaller.

15 Q And then, what did you do with it?

16 A Went to either Malleable or someplace like that. It

17 went to Hayes-Albion.

18 Q Hayes-Albion. And they recycled?

19 A Yep.

20 Q So let's focus on McGraw Edison.

21 A Okay.

22 Q When did you start hauling at McGraw -- or from McGraw?

23 A They was hauling when I started there.

24 Q Okay. And do you have a round-about, ball-park

25 figure; the '60s?

1 A Every day.

2 Q No, no, no. The year.

3 Was it in the '60s that you started  
4 that?

5 A Let's see.

6 Q Just a general figure would be good.

7 A In the '60s and '70s. I think it was '72 when I hurt my  
8 back, so that would be fifteen years before that.

9 Q Okay. And Whitey told you to go to McGraw Edison?

10 A Well, whenever I first started, he said go to McGraw and  
11 get this and get that; take the crane and go get the  
12 steel.

13 He'd have to -- he'd have to tell  
14 two of us, because I would take the crane and somebody  
15 else would take the truck.

16 Q And what would you do with the crane?

17 A Load the steel.

18 Q Load the steel. So you were hauling substantial size  
19 steel. It wasn't just small scrap metal that could be  
20 thrown in a --

21 A It was sheets about like that and bigger sheets.

22 MS. HENNING: Let the record  
23 reflect, what is it, about eight to ten inches?

24 THE WITNESS: It was ten inches to  
25 thirty inches. We got the biggest share of it.

1 Q (BY MS. HENNING, CONTINUING) So sometimes you would  
2 drive the crane -- or operate the crane?

3 A Right.

4 Q And sometimes you would drive the trucks?

5 A Right.

6 Q Let's focus on when you drove the truck.

7 You would -- let's describe a  
8 typical day working for Whitey Hall. Start from the  
9 beginning when you get to work.

10 A You'd take the crane and go to McGraw Edison. Some guy  
11 would bring a semi out, and you'd load that; go back to  
12 the yard, weigh it, come to Jackson with it.

13 Q Okay. Now how about when you hauled the dump truck,  
14 when you picked up barrels?

15 A Barrels?

16 Q Describe a typical work day.

17 A You go from the yard to McGraw, they load it, and go to  
18 the city dump and dump it; back to the yard.

19 Q Now you left Whitey Hall -- you would leave from the  
20 beginning of the day, Whitey would say "Go to McGraw  
21 Edison?"

22 A Right.

23 Q And then you would drive to McGraw; and when you got to  
24 McGraw, where would you go? A loading dock?

25 A Yeah, I had to load them barrels. I'd have to find

1           somebody to load the barrels.

2   Q       And was there a certain location that you went to every

3           day?

4   A       Yes. Might as well say a steel dock.

5   Q       A steel dock?

6   A       Yeah.

7   Q       And was there a person that you were to speak with?

8   A       Yes. I'd go see some guy by the name of Clyde.

9   Q       Clyde. And did Clyde work there?

10   A       He was a truck driver and boss-man over the parts

11           department. He'd find somebody to load your truck;

12           barrels, wooden skids wasn't no good.

13   Q       How long was Clyde there; do you recall?

14   A       He retired from there.

15   Q       But was he there for most of the time that you hauled?

16   A       Uh-huh.

17   Q       So he was the supervisor on the steel dock?

18   A       On the parts department, the parts department.

19                       He would -- you'd have to go see him

20           first for anything.

21   Q       Okay. So then you would go to see him, and he would

22           instruct some other employees to come and load your

23           truck?

24   A       Right.

25   Q       Do you recall any of these employees' names?

- 1 A No.
- 2 Q No. They were just general workers?
- 3 A Just general workers, lift truck drivers.
- 4 Q Lift truck drivers. Were there any sorts of rules or  
5 practices you were to follow when you went to pick up  
6 trash?
- 7 A No. Just find a man, load the truck, and get out of  
8 there.
- 9 Q And that was Whitey's instructions to you?
- 10 A Yes.
- 11 Q You didn't have any established rules or practice that  
12 you followed?
- 13 A No.
- 14 Q Did McGraw give you any sort of instructions?
- 15 A No.
- 16 Q When you went to go pick up the garbage or the skids or  
17 the drums from McGraw, did they give you any ticket or  
18 article of paper?
- 19 A Only on steel.
- 20 Q Only on steel.
- 21 A You have to tell them how much you got and how many  
22 loads you got.
- 23 Q Did they ever tell you why they never gave you any sort  
24 of other bills or tickets?
- 25 A No.



- 1 Q And do you know how Whitey was paid for the services?
- 2 A No.
- 3 Q So you weren't into that type of a business?
- 4 A No.
- 5 Q You just hauled for Whitey?
- 6 A Just hauled.
- 7 Q All right. I want you to focus on the barrels that you
- 8 would pick up, because you said you picked up skids,
- 9 wooden skids and scrap metal, and you picked up barrels.
- 10 A Right.
- 11 Q Can you describe the barrels to us?
- 12 A Fifty-five gallon barrels.
- 13 Q Fifty-five gallon.
- 14 A With the top cut halfway up.
- 15 Q Now, you mean the top, the very top?
- 16 A The top was cut halfway up and then folded back.
- 17 Q And do you know why they did that?
- 18 A So they can put stuff in it.
- 19 Q Okay. What kind of materials were in the drums?
- 20 A Off the paint tanks, the scrapings.
- 21 Q So you would look in the drums and you'd --
- 22 A You'd see it.
- 23 Q And they were -- there were just hunks of paint, dried
- 24 up paint?
- 25 A Some of it wet, some of it not wet; some were dried.

1 Q Do you recall what colors these paints were?

2 A Some were gray, some were yellow.

3 Q Did they call -- did they tell you any sort of  
4 instructions, that these were chemicals?

5 A No.

6 Q They just gave you the barrels and said --

7 A The barrels are there. Load them. Get them out of  
8 here.

9 Q Do you recall any odors?

10 A There wasn't none there, not that I remember.

11 Q You didn't smell anything, and they were just gray paint  
12 shavings?

13 A Just paint scrapings.

14 Q Yes.

15 A From cleaning of the paint tank, however you want to put  
16 it.

17 Q Okay. And you said sometimes that there were wet paints  
18 in these drums?

19 A Yes.

20 Q Do you recall, were they a different color? Were they  
21 all the same color?

22 A One of them gray -- some of them would be gray and some  
23 of them would be a yellowish color.

24 Q Yellowish color? Was it a distinguishing color, or was  
25 it just a general murky --

- 1 A Wet, soupy.
- 2 Q Okay. Were these drums usually full to the top?
- 3 A Four or five inches from the top, some of them half
- 4 full.
- 5 Q On a typical day, how many drums would you take from
- 6 McGraw?
- 7 A During the week, you'd get about three, four. On
- 8 Monday, a truck load.
- 9 Q And how large was your truck that you hauled? Do you
- 10 recall how many drums you could fit in your truck?
- 11 A Ten, twelve, on a Monday.
- 12 Q Uh-huh.
- 13 A During the week, probably three, four, five.
- 14 Q Would you go to McGraw every day during the week?
- 15 A Every day.
- 16 Q If you were absent from work for illness --
- 17 A Somebody else would go.
- 18 Q Do you recall who that would be?
- 19 A I didn't go out every day.
- 20 Q Oh, you didn't go every day?
- 21 A I would go one time, and then maybe somebody else would
- 22 go. All depended on what I had to do with the crane.
- 23 Q So it would just depend on the work order that Whitey
- 24 would give you that morning; right?
- 25 A Yes.

1 Q So on Mondays, you would have a full truck load,  
2 and the rest of the week you might have three to  
3 four barrels?

4 A Right.

5 Q Okay. And then you would take those barrels and you  
6 would load them into the truck?

7 A Right.

8 Q Would you secure them on the truck, or just load them  
9 and --

10 A Shut the gates on the truck.

11 Q What type of a truck was it, a --

12 A Dump truck.

13 Q -- dump truck?

14 And then you would drive to the  
15 landfill?

16 A Landfill, dump landfill.

17 Q And which dump did you drive to?

18 A One out on Erie Street.

19 Q Erie Street.

20 A City dump.

21 Q And do you recall whose landfill? It was just  
22 known as the city dump?

23 A Yeah, city dump.

24 Q Do you know who owned it or who ran it?

25 A Stevie, Stevick was his name. I don't know. I think it

1 was Stevick.

2 Q Stevick, S-t-e-v-i-c-k?

3 Do you think his name was Gordon?

4 Does that -- do you recall that?

5 A I don't know.

6 Q Do you recall any of the workers at the landfill?

7 A There was another one there, but I don't know who he  
8 was. I don't know his name or anything.

9 Q So you would drive up on Erie Road to the landfill --

10 A Right.

11 Q -- and you would come with your dump truck; and then,  
12 what would be your next --

13 A He'd tell you where to dump, and you'd go dump it.

14 Q So was it the same man every day that would tell you  
15 where to dump?

16 A Yes.

17 Q And do you recall, would you dump it out, or would you  
18 place the barrels onto the --

19 A Just raise the box and dump.

20 Q And the drums would just fall?

21 A Yes, fall.

22 Q So you would see some of the materials spill out?

23 A Right.

24 Q And do you know, when you'd come back, say, the next  
25 day, were the barrels covered over?

1 A Yes.

2 Q And what kind of cover was on the barrels; do you  
3 recall?

4 A What kind of cover?

5 Q Was it dirt?

6 A What kind of cover could it be?

7 Q It could be any number of items. I want you to tell me.

8 A Dirt.

9 Q Just dirt? It didn't have any -- it wasn't like  
10 murky tar, or --

11 A No.

12 Q So it was just plain old dirt?

13 A Right.

14 Q Okay.

15 I have a couple pictures here that  
16 we'll submit as exhibits. One is from 1967, and this is  
17 an aerial photo of the landfill, of the dump; and this  
18 -- here's the original. This might help you see.

19 Now, can you recall from this photo  
20 -- does this help you point out where you might have  
21 deposited the drums at?

22 A Anyplace.

23 Q Anyplace? Do you know, on this picture, where Erie Road  
24 is?

25 A No.

1 Q No?

2 A Is that it there? (Indicating)

3 Q So if you knew the road at the bottom of the photo, it  
4 curves, to be Erie Road, do you know then where you  
5 might have dumped the drums, or where you pulled your  
6 truck in?

7 A Just drive in here, back up and dump them.

8 Q So it would depend on the day, perhaps, where you might  
9 dump the drums?

10 A I might dump them in this corner, or I might dump them  
11 over in the other corner.

12 Q So it -- you would just depend on the operator's  
13 directions?

14 A Yes. Wherever he told me to dump, that's where we  
15 dumped.

16 Q But you never dumped out the drums manually --

17 A No.

18 Q -- you just let them spill out of the truck?

19 A Yes.

20 Q During your fifteen years working for Whitey Hall, for  
21 Blyveis, do you recall how many drums you might have  
22 taken?

23 A No.

24 Q Would you say hundreds or thousands? I don't expect you  
25 to know exactly, but --

1 A Well, you take ten once a week, or every Monday you take  
2 ten; the rest of the time, you take three or four. So  
3 there's twenty, there's thirty a week there.

4 Q So quite a few.

5 A And you do that every week, you've got quite a few.

6 Q Do you recall any pond or little pit that had some water  
7 at the landfill --

8 A No.

9 Q -- or dump?

10 So you don't recall dumping into a  
11 depression?

12 A No.

13 Q Do you recall any of the -- what the prior use of that  
14 land -- I take it that you've been around this area for  
15 quite some time?

16 A It was a gravel pit at one time.

17 Q It was a gravel pit.

18 Do you think that you might have  
19 been dumping into the old depressions from the gravel  
20 pit?

21 A Yes.

22 Q Do you know if the other truck drivers from Whitey Hall  
23 conducted the same type of operation as you did; that  
24 they went to McGraw -- they drove to McGraw; is that  
25 correct?



- 1 A They done the same thing I did.
- 2 Q And then they would drive from McGraw to the landfill -
- 3 -
- 4 A Right.
- 5 Q -- and dump out?
- 6 A Right.
- 7 Q And once you dumped out the drums, you would go back to
- 8 the shop or to the yard?
- 9 A Go back to McGraw and pick up something else.
- 10 Q Okay.
- 11 A Go back and pick up cardboard.
- 12 Q Where would you dump the cardboard?
- 13 A I'd take it back to the yard, bail it.
- 14 Q And what would happen to it?
- 15 A It would go to Kalamazoo or something and recycle it.
- 16 Q Okay. Was there anything else that you can think of
- 17 that you might have picked up?
- 18 A Not from McGraw.
- 19 Q No? When you completed your operations with McGraw for
- 20 a day, you would go back to the yard and return the dump
- 21 truck?
- 22 A Yep.
- 23 Q And would you talk to Whitey Hall then?
- 24 A I would work there the rest of the day, because that
- 25 would only take about two hours, three hours maybe.

1 Q Did you discuss what you had hauled?

2 A He knew what I had hauled.

3 Q And no records were kept?

4 A If they were, I never knew it.

5 MS. HENNING: We could take just a  
6 short break. Do you want -- are you thirsty or  
7 anything? Are you set?

8 THE WITNESS: I'm all set.

9 (Break taken.)

10 MS. HENNING: Are you ready to start  
11 up again?

12 THE WITNESS: Let's go.

13 MS. HENNING: Okay. Do you have any  
14 questions, or are you ready to roll?

15 THE WITNESS: No.

16 Q (BY MS. HENNING, CONTINUING) Okay. Just a couple  
17 points that I wanted to go back and talk to you about,  
18 about when you hauled the drums for McGraw Edison to the  
19 landfill.

20 Did you always haul to the landfill  
21 on Erie Road, the drums?

22 A No.

23 Q Where else did you haul the drums to?

24 A State Street.

25 Q State Street. Was that a dump owned by --

- 1 A It was a tate dump.
- 2 Q It was a state dump?
- 3 A The city dump on State Street.
- 4 Q Okay. Do you know who owned that?
- 5 A It was the city, I guess; city dump.
- 6 Q Do you know who ran that dump?
- 7 A Some colored guys is all I can tell you.
- 8 Q How often did you go to the State Street dump?
- 9 A Every morning, just like this one here.
- 10 Q So during your fifteen years that you worked for Whitey
- 11 Hall, how often did you haul to the landfill on Erie
- 12 Road?
- 13 A After the city dump closed up on State Street?
- 14 Q After that one closed?
- 15 A When that closed up.
- 16 Q Do you recall when that closed?
- 17 A No.
- 18 Q So you don't -- do you have an idea of a year that you
- 19 started hauling to this landfill on Erie Road?
- 20 A No.
- 21 Q Just a ball-park figure?
- 22 A I think we started dumping there first when I first went
- 23 there.
- 24 Q So you started first at --
- 25 A On State Street.

- 1 Q On State Street.
- 2 A When that one closed up, we went to Erie Street.
- 3 Q Do you know why it closed up?
- 4 A Filled up.
- 5 Q Filled up.
- 6 A It's a nice park now.
- 7 Q So would you say late '60s, maybe, that you started?
- 8 A Probably.
- 9 Q But can you say for sure?
- 10 A No, I can't say for sure. I'm not saying nothing for  
11 sure on dates.
- 12 Q That's okay. I just want to try and -- if you can  
13 approximate maybe any significant events in your life  
14 that you can think about that might have been around  
15 that time that you started hauling to the dump on Erie?
- 16 A No. All I can tell you is that when one closed up, I  
17 went to the other one.
- 18 Q So could you say maybe that you hauled to the landfill  
19 on Erie Road for ten years, or --
- 20 A Probably. Might be ten years, might be eight years.
- 21 Q Do you think it was -- it was at least one year; right?
- 22 A It was one year, maybe two years anyway.
- 23 Q So you know it was at least two years?
- 24 A Yeah.
- 25 Q Do you think it could have been at least five years?

1 A It could have been. Like I said, I don't know. It  
2 could have been five, it could have been ten, it could  
3 have been eight, could have been six; I don't know.  
4 Q Okay. But at least for two years?  
5 A Yes. Two years, anyway.  
6 Q Okay. And you hauled the paint barrels from McGraw to  
7 the landfill on Erie for at least two years?  
8 A Right.  
9 Q And you would have hauled at least how many barrels per  
10 day?  
11 A Three, four a day; ten on Monday.  
12 Q Ten on Monday.  
13 A At least ten on Monday.  
14 Q So during the week, Monday through Friday -- you didn't  
15 haul on Saturdays, did you?  
16 A No.  
17 Q Okay. So during the week, either you would go to McGraw  
18 or another driver would go to McGraw; so someone always  
19 picked up at least three to four barrels --  
20 A Right, during the week.  
21 Q -- and took them to the Erie Road landfill for at least  
22 two years?  
23 A Right.  
24 Q Did you have any major time breaks? Did you not haul  
25 during the winter months, or --

1 A You hauled every day.

2 Q Every day. So it didn't matter how cold, how frozen?

3 When the ground was frozen, do you  
4 know how -- they just dumped off the drums, same as  
5 every other day?

6 A Dump them off and then go.

7 Q Okay. When you started now at the State Street dump

8 --

9 A Right.

10 Q -- and then that filled up?

11 A Right.

12 Q And then you went to -- what is the -- oh, I'm sorry.

13 What is the park's name on the State  
14 Street ump now; do you recall? Is it a city park?

15 A They had a basketball court there and they tore that up  
16 a while ago. Now, it's just open land.

17 Q It's open land?

18 A They keep it cut, the grass cut.

19 Q Do you know at what street it's at?

20 A State Street.

21 Q State Street and another street?

22 A I don't know. One goes this way and one goes that way.  
23 It sets in the middle.

24 Q So it's a "Y"?

25 A Yes.

1 Q And the park is right at the fork of the two roads?

2 A We only dumped on -- we dumped on the left, on the west  
3 side of the State Street.

4 Q And you dumped just paint, paint barrels there?

5 Did you dump --

6 A We dumped everything there that we dumped at the other  
7 place.

8 Q So you would have taken maybe some -- you never took  
9 cardboard to the dumps; right?

10 A No, not unless it was waxed cardboard.

11 Q Waxed cardboard?

12 A If it had wax on it, we took it out.

13 Q Okay. And then what other materials would you take  
14 there?

15 A Paint.

16 Q Just paint?

17 A Paint, cardboard with wax on it, and skids.

18 Q And skids, broken up skids.

19 So you started at the State Street  
20 dump, and then you went to the landfill on Erie Road?

21 A Yes.

22 Q And did you haul there until the landfill closed; or do  
23 you recall --

24 A Which one?

25 Q The Erie Road landfill.

- 1 A I wasn't working there when it closed.
- 2 Q When that closed, you weren't --
- 3 A When it closed, I wasn't working.
- 4 Q so you had taken time of because of your back then?
- 5 A Right.
- 6 Q And your back acted up in 1970 --
- 7 A '72.
- 8 Q So do you know if the drivers still continued to haul to
- 9 the Erie landfill dump when your back was out?
- 10 A They did it after I quit.
- 11 Q Did you still talk to Whitey?
- 12 A Once in awhile. It was a while ago I talked to him.
- 13 Q Do you know what happened to the dump, why it closed up?
- 14 A Filled up or something.
- 15 Q Filled up?
- 16 A I guess, I don't know.
- 17 Q And then, do you know if they hauled to a different dump
- 18 after it closed up?
- 19 A Yes.
- 20 Q And what's the name of that dump?
- 21 A It wasn't a dump.
- 22 Q What was it?
- 23 A It wasn't a dump; it was just a guy's land. He wanted
- 24 it filled in, so they dumped barrels.
- 25 Q Do you know whose land that was?



- 1 A Copick.
- 2 Q Copick?
- 3 A On Michigan Avenue, West Michigan Avenue.
- 4 Q West Michigan.
- 5 A They were dumping Malleable dirt, paint barrels,
- 6 everything we didn't use.
- 7 Q And Malleable dirt, is that Hayes-Albion?
- 8 A Yes.
- 9 Q Now, when you say dirt, what --
- 10 A Black.
- 11 Q Black dirt?
- 12 A Black dirt.
- 13 Q Just like topsoil?
- 14 A No.
- 15 Q Do you know what kind of --
- 16 A No, it was a molding sand.
- 17 Q A molding sand.
- 18 A They take a brown sand and put secco pits, bond, sand,
- 19 and it makes it black.
- 20 Q It makes a --
- 21 A It makes it black. It makes a mold.
- 22 Q And do you know what they use this molding sand for?
- 23 A Yeah, they make parts.
- 24 Q Parts?
- 25 A Parts for your car.

1 Q Parts for my car. So that's the type of business that  
2 Malleable, which later became Hayes-Albion?

3 A Yes. Was Hayes-Albion, now it's Harvard Industry.

4 Q And they made parts for cars?

5 A Right.

6 Q Did you ever haul any of this black dirt to the dump on  
7 Erie?

8 A I never did.

9 Q You never did?

10 A Not that I know of -- or remember, put it that way.

11 Q Okay. When you would drive to this dump on Erie Road,  
12 when you would take the truck in and you would dump, do  
13 you recall how many feet or yards you might have gone  
14 in?

15 Would it have been 25 yards, 50  
16 yards, 100 yards; do you recall? Half way into the  
17 landfill, or --

18 A Well, again it was half as long as the building, this  
19 wall here.

20 Q Half as long as this?

21 A Half again as long.

22 Q Okay. So what could we approximate the wall to be?

23 MR. ROGERS: Twenty-five feet,  
24 maybe? What would you say?

25 THE WITNESS: Four, five, six,

1           seven, eight. Eight times four is thirty-two, thirty-  
2           four, and again as long.

3                       MR. ROGERS: Okay. That would be -  
4           -

5                       THE WITNESS: Am I right?

6                       MR. ROGERS: So 60 feet or so, 45 to  
7           60 feet?

8                       THE WITNESS: Forty-five to sixty.

9   Q       (BY MS. HENNING, CONTINUING) And that's about the usual  
10       distance that you would pull in to dump the barrels?

11   A       Right.

12   Q       Could you approximate, maybe, how much of a dip, or  
13       where you would -- if there was any depressions or you  
14       would just dump the --

15   A       You mean how far it was down at the bottom?

16   Q       Yeah.

17   A       Maybe tall as this building, this room.

18   Q       Into the pit?

19   A       Yes, down into it.

20   Q       So it was a very deep pit?

21   A       At one time, yes.

22   Q       And that was because it was a former gravel pit?

23   A       Yes.

24   Q       Just as tall as this building.

25   A       No, the room.

1 Q Just as tall as this room?

2 MR. ROGERS: Twelve feet.

3 Q (BY MS. HENNING, CONTINUING) So about twelve feet you  
4 would dump the --

5 A Yes, about twelve feet.

6 Q And then you saw, during those two years that you  
7 dumped, it was --

8 A Filling up.

9 Q So it was filling up?

10 A Yes.

11 Q And it was just filling up with drums?

12 A Drums, dirt. Every night they had to put two foot of  
13 dirt over the top of everything.

14 Q Do you know who made them put the dirt there?

15 A The state, I guess. I don't know.

16 Q You didn't know any of that information.

17 How wide was the pit; do you recall  
18 that?

19 A Probably wide as this room.

20 MR. ROGERS: Which we estimate at 25  
21 feet.

22 MS. HENNING: Twenty-five feet.

23 MR. ROGERS: Thirty-two. I'm sorry.

24 MS. HENNING: Thirty-two feet?

25 THE WITNESS: Close enough.

1 Q (BY MS. HENNING, CONTINUING) Okay. So 32 foot wide and  
2 about 12 foot deep?

3 A Right.

4 Q Okay. Do you recall any markings? Did you still see  
5 gravel or clay?

6 A Green grass over here and green grass over there.

7 Q Okay. So you don't recall seeing any clay or any type  
8 of material like that?

9 A No.

10 Q But they would cover with two inches of dirt?

11 A Two foot of dirt every night.

12 Q Two foot of dirt; I'm sorry.

13 Did they ever cover it with the  
14 black dirt from Albion Malleable?

15 A Not that I recall. I never seen it.

16 Q So just regular dirt.

17 Was there just one hole like this  
18 that you would dump the barrels into?

19 A That's all I ever seen.

20 Q So that's because you only dumped there for a limited  
21 amount of time?

22 A Yes.

23 Q Did any of the other drivers discuss dumping it at a  
24 different location at the landfill?

25 A Same place I told you out on Michigan Avenue.

1 Q Okay. But they didn't dump it in a different corner or  
2 in a different pit?

3 A I don't know.

4 Q When this was a gravel pit, before it became a dump,  
5 were there several depressions; do you recall?

6 A I don't know.

7 Q You didn't really drive by to ever look at it?

8 A I didn't before I started driving.

9 Q But it was just located on the former gravel pit?

10 A Right.

11 Q Did you see any other trucks, ever, at this landfill?

12 A Corning.

13 Q What kind of a truck was it?

14 A Dump truck. I don't know what they dumped.

15 Q And it had a marking on the side of it that said  
16 Corning?

17 A Yes.

18 Q Did you know the drivers from Corning?

19 A One guy was Williams or Washington; I don't know his  
20 name.

21 Q But you never spoke to him?

22 A Yeah, I talked to him, but I didn't know his first name.  
23 Everybody called him Wash.

24 Q Okay. And he never told you what type of materials --

25 A I never paid any attention to what anybody else was

1 dumping.

2 Q Okay. Did you see him with great frequency, if you  
3 would be out there?

4 A They just dumped like I did.

5 Q So about the --

6 A Once a day, maybe three times a day they'd dump.

7 It's -- they dumped stuff from each  
8 department. What they'd do, they'd go around to each  
9 department, pick up the trash.

10 Q What kind of departments did they have there; do you  
11 know?

12 A They made glass tubes is all I can tell you.

13 Q And you knew that from living in this area, that they  
14 made glass tubes?

15 A Uh-huh.

16 Q Were they broken tubes?

17 A Broken glass, cardboard that wasn't any good.

18 Q And they dumped in the same pit that you dumped?

19 A Right.

20 Q How about some of the household waste, the area  
21 residents; where did --

22 A You'd see tin cans and stuff like that in there.

23 Q And they dumped in the same pit?

24 A In that same place.

25 Q They didn't have a separate --

1 A They didn't have a separate place, no.

2 Q No? And the owner or the operator of the dump never  
3 told them to dump in a separate place?

4 A He told you where to dump when you went in.

5 Q Okay.

6 A He's stick his head out the door and tell you where to  
7 dump; there, there, there.

8 Q Okay. But he didn't distinguish between, say, you  
9 bringing your garbage from home, like trash, household  
10 trash --

11 A No, not at all.

12 Q -- from the barrels?

13 A If I backed up and dumped, pulled out, somebody else  
14 would back in there with household trash right on top of  
15 me.

16 Q Okay. So you had mixed in with your paint drums -- not  
17 your paint drums, but the paint drums that you were  
18 hauling --

19 A They were on my truck.

20 Q Did you ever see any sort of sludges or paste, some  
21 thick gooey substance, other than the paint?

22 A No.

23 Q So you never saw any sort of toothpaste-like sludge or  
24 greenish color?

25 A No. You get off, open the gate, back up and dump it,



1 and drive off.

2 Q So you never really looked at it?

3 A Never looked at it.

4 Q And so that people never really discussed the other  
5 types of waste?

6 A No.

7 Q How many other trucks would you see at the landfill,  
8 besides Corning?

9 A I don't know. Corning is the only one I can think of  
10 right now.

11 Q But you did recall seeing Corning about the same  
12 frequency that you were out there, and perhaps even  
13 more?

14 A More times than I was.

15 Q Did Whitey Hall ever have any of his drivers take  
16 materials from Corning to the dump?

17 A No.

18 Q Did Corning ever haul to any of the other dumps  
19 that you know of?

20 A Not that I know of. Just the one on State Street, that  
21 one there.

22 Q Do you recall a business named Union Steel?

23 A Yep.

24 Q What type of business were they in?

25 A Wire racks, bakery shelf racks.

1 Q Do you know where they took their waste products to, any  
2 garbage?

3 A No.

4 Q You never hauled for them?

5 A They took it the same place, yes.

6 Q They took it to the dump on Erie?

7 A Yes.

8 Q And they would dump in the same hole that everybody else  
9 dumped?

10 A Same hole, yes.

11 Q But you don't recall any sort of peculiar type of waste  
12 that they might have had, anything distinguishing?

13 A No.

14 Q They just backed the truck up --

15 A Backed up.

16 Q -- and dumped it out?

17 A Dumped it out.

18 Q Did anyone ever have anything unusual in the form of a  
19 truck, other than a dump truck, like a tank truck?

20 Did you ever see a tank truck --

21 A Not that I know of.

22 Q -- or anything else?

23 A I never seen one.

24 Q So you just saw regular old dump trucks?

25 A Yes.

- 1 Q And people would drive in with their cars?
- 2 A Cars. Open the trunk, throw it out, and drive off.
- 3 Q Was there any regular garbage pick-up service in this
- 4 area?
- 5 A Yes.
- 6 Q Would the garbage trucks pull up to the pit?
- 7 A I think they did.
- 8 Q Do you know, was that a city service, or was that owned
- 9 by a private company?
- 10 A It was owned by a private company.
- 11 Q Do you recall their name?
- 12 A Sheffield.
- 13 Q Sheffield?
- 14 A Yes.
- 15 Q Sheffield Sanitary?
- 16 A Yep. I think Modern here in Jackson dumped in there
- 17 too.
- 18 Q Modern? And they just picked up household, just the
- 19 kind of stuff that you throw out on your curb, regular
- 20 old trash?
- 21 A Yes.
- 22 Q Okay. And they would dump -- would they just back up
- 23 the garbage truck and empty it all out?
- 24 A Empty it all out, same way I did mine. Raise it up and
- 25 let it go.

1 Q What type of materials did you haul for Albion  
2 Industries?

3 A Scrap steel.

4 Q Scrap steel. And that went --

5 A Shavings.

6 Q Shavings. And that went to what dump?

7 A It didn't go to the dump.

8 Q Okay. That went to your yard if it was --

9 A In their yard, until we got enough of it to load up a  
10 truck.

11 Q And then you would cut it up and --

12 A It was already cut up.

13 Q Oh, it was already cut up.

14 So that steel you didn't cut up?

15 A No.

16 Q Do you recall any other industries from the area?

17 Decker Manufacturing, do you know that business?

18 A No. Decker, that was through Albion Iron and Metal.

19 That was owned by Victor Burstein. I don't know where  
20 they dumped.

21 Q So you just knew who owned it, but you didn't really  
22 know anything about where they took --

23 A He's the one that had the deal over the scrap iron in  
24 the Decker. Where it went, I don't know.

25 Q How about Brooks Foundry?

- 1 A Brook Foundry? You take scrap iron out there.
- 2 Q Did you pick up anything else out there?
- 3 A No,, didn't pick up nothing else.
- 4 Q Did they have that same type of molding sand that --
- 5 A Yep. That's what they're having trouble with there now.
- 6 Q And do you know where they took their molding sand?
- 7 A They dumped theirs right there in their yard.
- 8 Q In their yard.
- 9 A They owned quite a piece of land in there and just
- 10 filled it in.
- 11 Q Now, in this picture, do you know where Brooks is
- 12 located?
- 13 Was Brooks north of the dump where
- 14 you hauled to; do you recall?
- 15 A It was west of the dump.
- 16 Q West of the dump.
- 17 A West and north.
- 18 Brooks is on Michigan Avenue, and
- 19 this was on Erie Street.
- 20 Q Okay.
- 21 A They were probably about like that. The dump was here,
- 22 and they set over here on Michigan Avenue. (Indicating).
- 23 Q But you don't recall them ever taking any of their
- 24 molding sand to this dump?
- 25 A No.

1 Q They just kept it all?

2 A They just -- they just fill in their own land with it.

3 Q Would you say that the bulk of your business that you  
4 did for Whitey was hauling barrels or picking up scrap  
5 metal?

6 A It amounted to about the same, I guess.

7 Q About the same?

8 A Yes.

9 Q Now, you worked for Whitey for fifteen years?

10 A Right.

11 Q And you hauled to this dump for about --

12 A About two years, maybe five; I don't know.

13 Q Okay. So those other years that you worked for him, you  
14 hauled to the State Street?

15 A State Street, yes.

16 Q Do you recall there ever having been problems at the  
17 State Street dump?

18 A Not that I know of.

19 Q So they just made a park over it, and there's never been  
20 any clean-ups or problems there?

21 A Not that I know of.

22 MS. HENNING: I want to take a short  
23 break here.

24 (Break taken.)

25 Q (BY MS. HENNING, CONTINUING) Mr. Mosher, I want you to

1 focus on Copick's hole or his dump again.

2 Now, how long did you haul at  
3 Copick's? Did you haul materials there?

4 A Uh-huh.

5 Q Do you know how long you might have hauled materials  
6 there?

7 A Probably three years.

8 Q Okay. Do you know the cross street where Copick's dump  
9 was located?

10 A 26 1/2 Mile Road.

11 Q Okay.

12 A And back this way, 27th.

13 Q Okay. And he, Mr. Copick, just wanted his land to be  
14 filled in?

15 A Yes.

16 Q And so, he accepted trash from the local industry?

17 A Well, from Hayes-Albion and the stuff we dumped in  
18 there.

19 Q And from Hayes-Albion, it was the molding sand?

20 A Yes.

21 Q And he liked the barrels too, even though it wasn't  
22 filled really --

23 A Yep.

24 Q -- like dirt filled?

25 A Yep.

- 1 Q He didn't mind the barrels?
- 2 A I guess not.
- 3 Q How about cardboard? Would the waxy cardboard go there
- 4 too?
- 5 A Skids.
- 6 Q Skids? And do you know how long area truck drivers went
- 7 to Copick's dump?
- 8 A How long?
- 9 Q How long did it take to fill it in?
- 10 A No.
- 11 Q You don't know how long?
- 12 A No, I don't know how long.
- 13 Q Did it fill in when you were still working for
- 14 Whitey Hall?
- 15 A No.
- 16 Q No?
- 17 A Afterwards.
- 18 Q Just from living in this area, do you recall if it was
- 19 all filled in in 1980?
- 20 A Yes.
- 21 Q How about -- would it have been filled in by 1975?
- 22 A No.
- 23 Q No. So it was sometime between the period of 1975 and
- 24 1980 --
- 25 A Between them two, yeah.



1 Q -- that it became all filled in?

2 A Yes.

3 Q Do you know what is located at Copick's dump now?

4 A What's located? Nothing.

5 Q Nothing.

6 A Weeds.

7 Q Weeds. But they're growing there?

8 A Yeah, they're growing there.

9 Q I want you to focus one more time on the drums of paint  
10 back at McGraw Edison.

11 No one ever discussed these drums  
12 with you, they just gave them to you and you hauled them  
13 away?

14 A Go up to McGraw, get them drums, and take them to the  
15 dump.

16 Q Okay. That's it?

17 A That's it.

18 Q They didn't explain much.

19 And they were sometimes liquid and  
20 sometimes they were more of --

21 A Solid.

22 Q -- more solid.

23 Do you know if it was more liquid  
24 most of the time, or was it more solid most of the time?

25 A About half and half.

1 Q About half and half. Do you know why it would vary?  
2 Did they ever explain that to you?

3 A No.

4 Q What type of business did they do at McGraw; do you  
5 recall that?

6 A Made heating stoves, air conditioners. That's about it,  
7 I guess.

8 Q And do you know what they used this paint for?

9 A To paint the cabinets with.

10 Q The cabinets with.

11 Do you know what colors -- did the  
12 paint from the drums match the colors of the units, or  
13 was it just a mixture?

14 A Just a mixture.

15 Q So could you say that the drums contained the cast-offs  
16 of different paint lines, or was it, you know, stored up  
17 over some weeks?

18 How did it get to be mixed? Did  
19 they ever explain that to you?

20 A Every Saturday they cleaned their tanks. Washed tank,  
21 paint tank, wash tank, paint; and they scummed them off.  
22 That's all I can tell you.

23 Q Scummed them off?

24 A Every time the bottom would get scummed, they'd wash it  
25 off.

1 Q Do you know how they did that?

2 A I never watched them. They do that on Saturday.

3 Q How did you know that they had the different tank  
4 system?

5 A Well, I seen them tanks.

6 Q You saw that.

7 Did you ever see anything about the  
8 paint line?

9 A No.

10 Q So you --

11 A You can stand back here, and you can see the paint  
12 tanks.

13 Q Do you know how big the paint tanks were?

14 A No.

15 Q Was there --

16 A You stand back a ways, and you can see the paint tank,  
17 the line going down to them.

18 Q But you didn't now anything about the operations?

19 A No, not about the operation of them; no.

20 Q Were there any markings on the drums?

21 A No.

22 Q What color were the drums? Were they --

23 A I don't know. They might be black, might be blue.

24 Q But there was nothing distinctive?

25 A No markings to tell what they were in before.

1 Q When you would take the drums to the dump on Erie Road,  
2 did the operator know where those drums were coming  
3 from?

4 A I don't know.

5 Q He never asked?

6 A He never asked.

7 Q And you never said?

8 A He never asked me where they were coming from.

9 Q And you never told them?

10 A You never tell them any more than you had to.

11 Q So you just drive up and dump?

12 A Right.

13 Q Is there anything else that you can think of that you  
14 could tell us about the drums that might be of interest  
15 to us, or of McGraw Edison?

16 A No.

17 Q Was that steel loading dock, was that their only dock  
18 that you could pick up the drums from?

19 There was no other area where you  
20 would pick it up?

21 A No other area. That's where you always had -- you had  
22 the steel dock.

23 Q Did they ever have any stored outside?

24 After they cleaned the tanks on  
25 Saturday, would they store these drums outside or were

1           they inside the building?

2   A       No, they'd be outside.

3   Q       And were they on skids, or --

4   A       Nope.

5   Q       They were just sitting on the --

6   A       Sitting on the cement.

7   Q       Could you describe to us Clyde at McGraw Edison?

8                               Do you recall how old he was?

9   A       No.

10   Q       Do you know, was he white?

11   A       He was white.

12   Q       Was he from Albion?

13   A       I don't know. I don't think so.

14   Q       Was he an employee for McGraw quite some time?

15   A       Right.

16   Q       And did he stay there until the plant closed, do you  
17           recall?

18   A       I think he did. I wouldn't say that for sure, but I  
19           think he did.

20   Q       Was there anything distinctive about Clyde, any marks?

21                               Did he wear glasses?

22   A       No, he didn't wear glasses, no.

23   Q       No. So you can't think of anything to describe Clyde?

24   A       After twenty years, you don't --

25   Q       You just knew him as Clyde?

- 1 A I only knew him as Clyde. That's it.
- 2 Q And he never sent bills to you?
- 3 A He never sent bills to me, no.
- 4 Q So you never had any sort of pieces of paper?
- 5 A The only paper I had, if I went in for a slip for the
- 6 steel I would pick up.
- 7 Q And who did you pick that up from?
- 8 A From Clyde.
- 9 Q From Clyde.
- 10 A He'd make it out and I would take it back to the office.
- 11 Q Okay. Do you know how the services were paid to your
- 12 boss, to Whitey?
- 13 A No.
- 14 Q But Whitey would sign your paychecks?
- 15 A Right.
- 16 Q And you never inquired as to how Whitey was paid?
- 17 A I don't care where he got the stuff, as long as I got my
- 18 paycheck. That was it.
- 19 Q Was there any holdup ever of your paychecks?
- 20 A No.
- 21 Q Were you paid on a regular basis?
- 22 A Paid every Friday.
- 23 Q And there was never any problem with industries paying
- 24 Whitey to pay you?
- 25 A I guess not.

1 MS. HENNING: I guess we can't think  
2 of anything else. We appreciate your help.

3 And Mr. Mosher, you have the right  
4 and the opportunity to review this transcript of what  
5 we've discussed today for accuracy, to make sure that it  
6 was what you said and what you understand the operations  
7 of the dump to be. And if you desire, you can waive  
8 your review of this, and you would waive signature of  
9 this transcript.

10 So would you like to review this?

11 THE WITNESS: Read it here? How are  
12 you going to do that?

13 MS. HENNING: No. She has to type  
14 it up, and then you would review it.

15 Do you want to -- do you wish to  
16 review this document?

17 THE WITNESS: I would.

18 MS. HENNING: Okay. Then we will  
19 reserve signature; and I think that's it.

20 (WHEREUPON, Mosher Deposition  
21 Exhibit Number 1 was marked for  
22 identification by the Court  
23 Reporter.)  
24 (Proceedings concluded at 10:00  
25 a.m.)

CERTIFICATE OF NOTARY PUBLIC

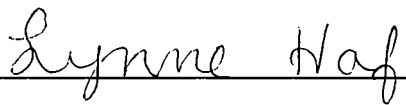
(STATE OF MICHIGAN)  
SS  
(COUNTY OF INGHAM )

Being a Notary Public duly  
commissioned and qualified in and for the State of Michigan  
at Large, I do hereby certify that pursuant to notice there  
came before me the deponent herein, who was by me first duly  
sworn to testify to the truth and nothing but the truth  
touching and concerning the matters in controversy in this  
cause.

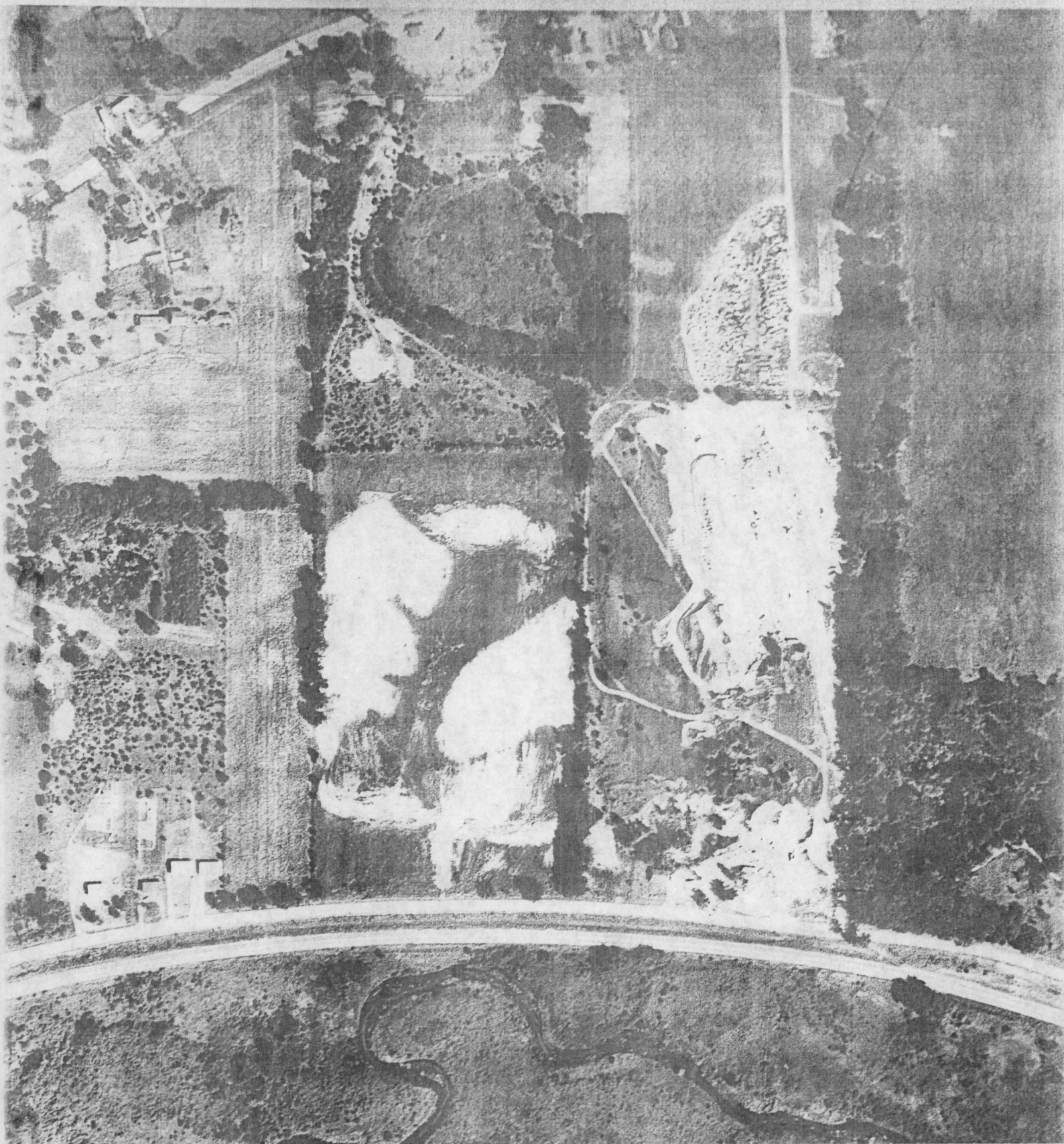
Being thereupon carefully examined  
under oath, said examination was recorded stenographically,  
and was later reduced to transcription under my supervision;  
said transcription being a true record of the testimony given  
by the witness.

I further certify that I am neither  
attorney or counsel for, nor related to or employed by any of  
the parties to the action in which this deposition is taken;  
and, further, that I am not a relative or employee of any  
attorney or counsel employed by the parties hereto, or  
financially interested in the action.

IN WITNESS WHEREOF, I have hereunto  
subscribed my signature this 2nd day of August, 1991.

  
Lynne Haf (CSR-4545)





DEPOSITION  
EXHIBIT  
1  
7-26-91 Ukh

September 12, 1967